

Exhibit B

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FACEBOOK, INC., a Delaware
corporation,

Plaintiff,

v.

BRANDTOTAL LTD., an Israeli
corporation, and UNIMANIA, INC.,
a Delaware corporation,

Defendants.

CASE NO.: 3:20-CV-07182-JCS

**PLAINTIFF/COUNTERCLAIM
DEFENDANT FACEBOOK, INC.'S
SECOND SET OF REQUESTS FOR
PRODUCTION TO BRANDTOTAL
LTD. AND UNIMANIA, INC.**

Complaint Filed: October 14, 2020

PROPOUNDING PARTY: Plaintiff FACEBOOK, INC.

RESPONDING PARTY: Defendant BRANDTOTAL LTD. and
UNIMANIA, INC.

SET NO.: Two

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Pursuant to Federal Rules of Civil Procedure, Rules 26 and 34, Plaintiff/Counterclaim Defendant Facebook, Inc. (“Facebook”), hereby serves its Second Set of Requests for Production of Documents (the “Requests”) upon Defendants/Counterclaim Plaintiffs BrandTotal, Ltd. and Unimania, Inc. (collectively, “Defendants”) who shall provide a written response and produce for inspection and copying the documents and things requested below no later than 30 days after the service of these Requests.

These Requests call for all documents and tangible things in your possession, custody, or control, or in the possession, custody, or control of your attorneys, agents, or representatives, or other persons acting under your authorization or direction, irrespective of who generated, prepared, or signed the documents.

DEFINITIONS

1. “Action” means the above-captioned action and the preceding state-court action, filed on October 1, 2020 in the Superior Court of California, County of San Mateo, case number 20-CIV- 04256.

2. “All” means “any,” “each,” and “every,” and vice versa.

3. “Communication” or “Communications” has the broadest meaning permitted under the Federal Rules of Civil Procedure, and includes any transmission of information between two or more persons, whether by, without limitation: personal meeting, telephone, letter, telegraph, e-mail, electronic bulletin board, electronic “chat room”, instant message, text message, any other form of electronic correspondence, teleconference, facsimile, telex, or any other means whatsoever.

4. “Concerning” and “relating to” have their commonly understood meaning, including comprising, reflecting, evidencing, constituting, pertaining to, dealing with, referring to, respecting, consisting of, embodying, establishing, connected with, commenting on, describing, analyzing, and/or showing.

5. “Customer” means any individual or entity using any of Your marketing and advertising products or services, but does not include User of Your Products.

6. “Document” or “Documents” shall have the broadest meaning permitted under the Federal Rules of Civil Procedure and relevant case law, and shall include without limitation all written or graphic matter, whether stored, displayed, communicated, or transmitted, of every kind or description, however produced or reproduced, whether draft or final, original or reproduction, including: electronically stored information, written Communications, letters, memoranda of interoffice Communications, records, statistical and financial statements, charts, graphs, reports, minutes, emails, voicemails, sound or video recordings of any type, contracts, agreements, computer diskettes, CDs or DVDs, or material similar to any of the foregoing, however denominated, by whomever prepared, and to whomever addressed, which are in Your possession, custody or control or to which You have, have had or can obtain access.

7. “Facebook Computers” means Facebook or Instagram’s computers, computer system, computer network, or servers.

8. “Including” means including but not limited to.

9. “Investors” means an individual or entity providing capital or cash to You.

10. “Product” or “Products” means any web-browser extension, application, or other software developed, distributed, and/or promoted by BrandTotal, Ltd. and/or Unimania, Inc.

11. “Technology” means all versions of computer code, change log, source code, computer program, software, binaries, executables, physical or virtual servers, Internet Protocol addresses of those servers, web logs, server logs, activity logs, captured network traffic, computer hardware or software, communication infrastructure and protocols.

12. “Users” means a person using one or more of Your products.

13. “You” and “Your” refers to BrandTotal, Ltd. and Unimania Inc., including BrandTotal, Ltd.’s and Unimania Inc.’s officers and employees.

14. The singular form of a word shall be interpreted as plural, and vice versa; the use of any tense of any verb includes also within its meaning All other tenses of the verb so used. The connectives “and” and “or” shall be construed either disjunctively or conjunctively so as to acquire the broadest meaning possible, so as to bring within the scope of the request All information that might otherwise be construed to be outside its scope.

INSTRUCTIONS

1. In answering each document request, You are requested to furnish All Documents, however held or obtained, that are in Your possession, custody or control—including but not limited to legal (de jure), actual (de facto), constructive, and practical possession, custody, or control of Your officers, directors, employees, contractors, counsel, auditors, insurers, investigators, consultants, agents or other representatives acting for or on Your behalf, or that are maintained in Your records, Including, but not limited to, Documents obtained through discovery in this or any other litigation.

2. Each request that seeks Documents relating in any way to Communications to, from, or within a governmental, business, or corporate entity means All Communications to, from, between, or among representatives, officers, officials, directors, employees, agents, servants, and anyone acting on behalf of such entity.

3. Should You find the meaning of any term in these requests to be unclear, You should assume a reasonable meaning, state what that assumed meaning is, and respond to the request on the basis of that assumed meaning.

4. If You object to any request or portion thereof on the ground that You contend that it calls for a Document that is privileged, falls within the work product doctrine, or is otherwise protected from disclosure, provide a privilege log that complies with Federal Rule of Civil Procedure 26(b)(5).

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 19:

All Documents relating to Your decision to identify Facebook and Instagram as “participating sites.”

REQUEST FOR PRODUCTION NO. 20:

All Technology Your Products use or used for the purpose of accessing and communicating with Facebook Computers.

REQUEST FOR PRODUCTION NO. 21:

Documents sufficient to show revenue You generated in connection with Your collection of data from Facebook Computers.

REQUEST FOR PRODUCTION NO. 22:

All Documents identified in Your responses to interrogatories.

REQUEST FOR PRODUCTION NO. 23:

All Documents or Communications that You may rely on in support of any affirmative defense in this Action.

REQUEST FOR PRODUCTION NO. 24:

All Documents or Communications related to modifications You have made to the Technology You have used to interact with Facebook Computers.

REQUEST FOR PRODUCTION NO. 25:

All Documents relating to the nature, size, and methods You use or used to store data or information You obtained from Facebook Computers using Your Technology.

REQUEST FOR PRODUCTION NO. 26:

All marketing materials You created, distributed, published, or made available to current, prospective, or former Customers that refer to data or information Your Products obtain from Facebook or Instagram.

REQUEST FOR PRODUCTION NO. 27:

All data and information You obtained from Facebook Computers through Your Products.

REQUEST FOR PRODUCTION NO. 28:

All Documents that identify information obtained from Facebook Computers using your Products relating to a User who was not a “Panelist,” as that term was used in the Supplemental Declaration of Oren Dor dated February 17, 2021.

REQUEST FOR PRODUCTION NO. 29:

All Documents relating to the “demographic data from social media/application users” by “Value Add applications” obtained from Facebook Computers as described in the Report of Robert Sherwood.

Dated: February 23, 2021

HUNTON ANDREWS KURTH LLP

By: /s/ Ann Marie Mortimer
Ann Marie Mortimer
Jason J. Kim
Jeff R. R. Nelson
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Defendant FACEBOOK, INC.

Platform Enforcement and Litigation
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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to this action. My business address is 550 South Hope Street, Suite 2000, Los Angeles, California 90071-2627.

On **February 23, 2021**, I served the foregoing document(s) described as: **PLAINTIFF/COUNTERCLAIM DEFENDANT FACEBOOK, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO BRANDTOTAL LTD. AND UNIMANIA, INC.,** on the interested parties in this action:

SEE SERVICE LIST ATTACHED

By MAIL: by causing to arrange an employee of Hunton Andrews Kurth LLP, 550 S. Hope Street, Suite 2000, Los Angeles, CA 90071-2627, to place a true and correct copy(ies) of the above-named documents in a sealed envelope addressed to the attorney(s) of record above, and to place those envelopes in the United States Mail, postage pre-paid, according to the ordinary practice of mailing correspondence.



By PERSONAL SERVICE: by causing to be served on all other parties to this action by requesting that a messenger from **Express Network** deliver true copies of the above-named documents, enclosed in sealed envelopes addressed as indicated above.



By OVERNIGHT MAIL: by overnight courier, I arranged for the above-referenced document(s) to be delivered to an authorized overnight courier service for delivery to the addressee(s) above, in an envelope or package designated by the overnight courier service with delivery fees paid or provided for.



By ELECTRONIC MAIL: by causing a true and correct copy thereof to be transmitted electronically to the attorney(s) of record at the e-mail address(es) indicated in the attached service list.

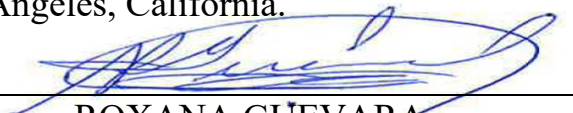


By CM/ECF: I hereby certify that on the below date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants (if any) indicated on the Manual Notice list.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on **February 23, 2020**, at Los Angeles, California.


 ROXANA GUEVARA

SERVICE LIST*Facebook, Inc. v. BrandTotal, Ltd., et al.*

USDC Northern District of California Case No.3:20-cv-07182-JCS

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